

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

ROXANNE HELLING,		NO.
	Plaintiff,	
v.		COMPLAINT FOR DAMAGES
ALASKA AIRLINES, INC.		JURY DEMAND REQUESTED
	Defendant.	

Plaintiff Roxanne Helling alleges as follows:

**I. PARTIES**

1.1 Plaintiff Roxanne Helling was formerly employed with Alaska Airlines, Inc. Ms. Helling resides in Des Moines, King County, Washington.

1.2 Defendant Alaska Airlines, Inc. (“Alaska Airlines”) is an Alaska corporation with an agent registered with the Washington Secretary of State, and is doing business in Seattle, King County, Washington.

**II. JURISDICTION & VENUE**

2.1 Ms. Helling alleges federal claims against Alaska Airlines under the Family Medical Leave Act, 29 U.S.C. § 2601 *et seq.* (“FMLA”).

1           2.2   Ms. Helling also alleges State claims against Alaska Airlines under  
2 Washington's Family Leave Act ("WFLA"), RCW Chapter 49.78, and the Washington's Law  
3 Against Discrimination ("WLAD"), RCW Chapter 49.60.

4           2.3   This Court has jurisdiction over Ms. Helling's federal claims alleged herein  
5 and has jurisdiction to grant the relief requested under 28 U.S.C. § 1331. This Court has  
6 supplemental jurisdiction over Ms. Helling's related state law claims under 28 U.S.C.  
7 § 1367.

8           2.4   Venue is proper in the Western District of Washington at Seattle pursuant  
9 to 28 U.S.C. § 1391(b) because Defendant is doing business in the State of Washington  
10 and has offices in Seattle, King County, Washington, and the wrongful acts alleged  
11 herein occurred in Seattle, which is in the Western District of Washington's Seattle  
12 Division.

13           2.5   Alaska Airlines' registered agent for service of process is Kyle Levine,  
14 19300 International Boulevard, SeaTac, WA 98188.  
15

16  
17                                   **III.     FACTUAL BACKGROUND**

18           3.1   Ms. Helling began employment with Alaska Airlines in 1997. Starting in  
19 2007, Ms. Helling became a Ground Operations Training Specialist which was  
20 reclassified as Training Delivery Specialist in 2008.

21           3.2   In January 2014, Ms. Helling learned she would need sinus surgery, which  
22 would require time away from work. Ms. Helling scheduled the surgery for February  
23 2014.  
24  
25  
26

1           3.3    On January 21, 2014, Ms. Helling informed her supervisor, Lisa McCarroll,  
2   of the need for medical treatment. Ms. McCarroll was initially agreeable with the  
3   medical absence.

4           3.4    The following day, January 22, 2014, Ms. McCarroll changed her position  
5   and requested that Ms. Helling reschedule her surgery for a few months later. On  
6   January 22, 2014 at 11:36 a.m., Ms. McCarroll followed up this conversation with an  
7   email directed to Ms. Helling, and a higher level supervisor, Stacie Baker. A copy of this  
8   email is attached as Exhibit A. In this email, Ms. McCarroll, in relevant part, wrote:  
9   “When we met Tues I was caught off guard with your request for extended time off in  
10   Feb. . . . The timing is bad, there is simply too much to do and having you out at this time  
11   puts extra work on others. So I have to ask for the following: would it be possible for you  
12   to reschedule sometime after March?”

13           3.5    Ms. Helling then sought advice from Human Resources employee Leslee  
14   Cabulagan. During this meeting, Ms. Helling explained that she was concerned that if  
15   she had her medical treatment, then it could affect her job. Ms. Cabulagan asked why  
16   there was a concern and Ms. Helling explained what had occurred with Ms. McCarroll.  
17   After this meeting, on January 24, 2014, Ms. Helling wrote Ms. Cabulagan explaining, in  
18   part: “Thanks for taking the time to listen and help me yesterday. . . . I have attached a  
19   copy of the note from Lisa so that you can understand her request. Again I do not want  
20   to come across as complaining about her I just want to make sure that I can protect my  
21   position at a very difficult time.” A copy of this email exchange is attached as Exhibit B.

22           3.6    Following her consultation with Human Resources, Ms. Helling received a  
23   call from Ms. McCarroll asking for a meeting. Ms. Helling was then taken to Todd  
24   Sproul’s office where Ms. McCarroll initiated a hostile encounter. Ms. McCarroll started  
25   the meeting by asking Ms. Helling who did she think she was. Ms. McCarroll then stated  
26

1 that Ms. Helling was trying to destroy her career and challenged why Ms. Helling went to  
2 Human Resources to report what had happened. Ms. McCarroll shouted at Ms. Helling  
3 about how she had undermined her and would pay.

4 3.7 On Tuesday, January 28, 2014, Ms. Helling was called in to meet with  
5 Ms. McCarroll for a performance review. During this meeting, Ms. McCarroll explained  
6 that Ms. Helling was going to be placed on a performance improvement plan and if she  
7 did not pass, then it would result in termination. During this meeting, Ms. McCarroll said  
8 that Ms. Helling was not trustworthy. Ms. McCarroll stated that Ms. Helling had  
9 destroyed her career and that she was not going to put up with her anymore. On  
10 January 30, 2013 and February 4, 2014, Ms. McCarroll completed her review. A copy of  
11 the review is attached as Exhibit C. In her Annual Review, Ms. Helling was given a rating  
12 of "Fully Successful" for Business Comprehension, Divisional Inclusion, Customer  
13 Service, and Safety and Security but given a rating of "Needs Development" on the  
14 remaining categories which were Ms. McCarroll's subjective evaluations under the  
15 headings of Technical Skills, Maintain Humility, Interpersonal Interaction, and  
16 Accountability. In complete contrast to this negative review, on February 26, 2013,  
17 Ms. McCarroll provided Ms. Helling with an annual review for the prior year with all  
18 categories assessed as "Fully Successful". A copy of Ms. Helling's review from February  
19 2013 is attached as Exhibit D.

20 3.8 Before her medical leave, Ms. Helling wrote Human Resources explaining  
21 that she was experiencing retaliation. Ms. Helling's letter of February 10, 2014 is  
22 attached as Exhibit E. Ms. Helling wrote, in relevant part:

23 I understand from Pat Knollen that you are aware of my concerns on  
24 my medical leave and my concerns regarding the possible  
25 repercussions that might occur. I am very concerned and  
26 uncomfortable at this time talking with anyone regarding this as I  
feel that I am being retaliated against because I have seeked [sic]

1 HR help. I have received verbal lashing as well as down right abuse  
 2 following this meeting with Leslie on January 23<sup>rd</sup>. My job  
 3 performance on January 24 was not a concern became a needs  
 4 development Performance Partnership on February 4<sup>th</sup>. I have had  
 5 no written communication of concern but have been told that this  
 6 visit was uncalled for and damaging. I have never in 16 ½ years had  
 7 anything like this happen to me. My performance and character has  
 8 never been questioned. I am really not sure where I go from here.  
 9 When I seeked [sic] advice on my leave on January 23, 2014, it was  
 10 truly for advise not to get anyone in trouble and certainly not to  
 11 question the charcter [sic] of my manager. It seems that this has  
 12 now become an issue and I am not being trustworthy. I am going out  
 13 on my approved FMLA medical leave tomorrow February 11<sup>th</sup>. What  
 14 do I need to do so that I can come back to work without this hanging  
 15 over my head.

16 3.9 Ms. Helling was on medical leave through approximately February 24,  
 17 2014. As promised, on April 16, 2014, Lisa McCarroll placed Ms. Helling on a 90-day  
 18 Performance Improvement Plan. Regardless of the work that Ms. Helling did to comply  
 19 with the requests in this plan, nothing was satisfactory.

20 3.10 In June of 2014, Ms. Helling asked Vice President Jeff Butler whether she  
 21 could transfer within the company. Initially, Mr. Butler said that she could, but then he  
 22 consulted with Human Resources and was told this was not a possibility for Ms. Helling  
 23 even though the company had made transfers like this in the past. Mr. Butler's email is  
 24 attached as Exhibit F.

25 3.11 In July, Ms. Helling was instructed that she could either resign or she  
 26 would be involuntarily terminated, which would come with a host of negative  
 consequences. Ms. Baker's July 15, 2014 letter memorializing this situation is attached  
 as Exhibit G.

3.12 In September 2014, after 17 years of service to Alaska Airlines, her  
 employment ended. Ms. Helling wrote her employer making it clear that she did not  
 resign "but was forced into retirement following [her] performance plan results." A copy  
 of Ms. Helling's September 1, 2014 letter is attached as Exhibit H.

1           3.13 As a result of her termination, Ms. Helling has suffered both general and  
2 special damages, including lost wages, benefits, emotional distress, and humiliation.

3                                   **IV. FIRST CAUSE OF ACTION**  
4                                   **VIOLATION OF THE FAMILY MEDICAL LEAVE ACT**

5           4.1 Alaska Airlines is subject to the FMLA.

6           4.2 Ms. Helling was eligible for protection under the FMLA.

7           4.3 Ms. Helling was entitled to leave because of her health condition.

8           4.4 In terminating her employment for discriminatory and retaliatory purposes,  
9 Alaska Airlines violated the FMLA.

10           4.5 As a direct and proximate result of Alaska Airlines' violation, Ms. Helling  
11 has suffered lost wages in an amount to be proven at trial. Pursuant to the FMLA, she is  
12 entitled to recover all past and future lost wages along with interest, attorneys' fees, and  
13 costs. Because Alaska Airlines' violation was not in good faith, it is also liable for  
14 liquidated damages, double damages, or punitive damages as allowed by the FMLA.  
15

16                                   **V. SECOND CAUSE OF ACTION**  
17                                   **WASHINGTON'S FAMILY LEAVE ACT ("WFLA"), RCW CHAPTER 49.**

18           5.1 Alaska Airlines is subject to the WFLA.

19           5.2 Ms. Helling was eligible for protection under the WFLA.

20           5.3 Ms. Helling was entitled to leave because of her health condition.

21           5.4 In terminating her employment for discriminatory and retaliatory purposes,  
22 Alaska Airlines violated the WFLA.

23           5.5 As a direct and proximate result of Alaska Airlines' violation, Ms. Helling  
24 has suffered lost wages in an amount to be proven at trial. Pursuant to the WFLA, she is  
25  
26

1 entitled to recover all damages with interest, double damages, liquidated damages, and  
2 attorneys' fees, and costs.

3 **VI. THIRD CAUSE OF ACTION**  
4 **WASHINGTON'S LAW AGAINST DISCRIMINATION**

5 6.1 The conduct, acts, and omissions of Alaska Airlines constitute disability  
6 discrimination by retaliating, failing to accommodate, and wrongfully terminating  
7 Ms. Helling because of her health condition or perceived health condition and/or the  
8 inconveniences associated with the requested accommodation and medical leave. Such  
9 acts, singularly and collectively, are in violation of WLAD.

10 6.2 As a direct and proximate result of Alaska Airlines' discriminatory and  
11 retaliatory conduct, Ms. Helling has suffered damages in an amount to be proven at trial.  
12 Pursuant to WLAD, she is entitled to recover all actual and compensatory, economic and  
13 non-economic, special and general damages, as well as attorneys' fees and litigation  
14 expenses.  
15

16 **VII. PRAYER FOR RELIEF & JURY DEMAND**

17 Plaintiff Roxanne Helling asks the Court for the following relief:

18 A. For judgment against Defendant Alaska Airlines, Inc. for all actual and  
19 compensatory, economic and non-economic, general and special damages as allowed by  
20 law;  
21

22 B. For all liquidated damages and double damages as allowed by law;

23 C. For all costs, expenses of litigation, interest, and reasonable attorneys'  
24 fees as allowed by law;  
25  
26

1 D. For an enhanced award for federal tax consequences to make Plaintiff  
2 whole;

3 E. For trial by jury; and

4 F. For such other relief as the court deems just and equitable.

5 Dated this 4th day of April, 2016.

6  
7 GORDON THOMAS HONEYWELL LLP

8  
9 By: /s/ James W. Beck

10 James W. Beck, WSBA No. 34208

11 jbeck@gth-law.com

12 Stephanie Bloomfield, WSBA No. 24251

13 sbloomfield@gth-law.com

14 Attorneys for Plaintiff  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26




# EXHIBIT A

Printed by: Kim Ehlers  
Title: Re: leave in Feb : Eagle Server

Wednesday, January 22, 2014 11:39:34 AM  
Page 1 of 1

---

From:  Lisa McCarroll

Wednesday, January 22, 2014 11:36:42 AM 

Subject: Re: leave in Feb

To:  Roxanne Helling

Cc:  Stacie Baker

Bcc:  Kim Ehlers

---

Rox - When we met Tues I was caught off guard with your request for extended time off in Feb. After our meeting I reviewed the team calendar and projects. Normally, it wouldn't be a problem. But as you know, we are short staff and we are in the midst of huge body of work with the Delta transition. The timing is bad, there is simply too much to do and having you out at this time puts extra work on others.

So I have to ask for the following: would it be possible for you to reschedule sometime after March?

If you can't reschedule, due to your condition I will need you to provide a doctor's note and request FMLA as soon as possible.

[http://www.alaskasworld.com/es/EmployeeInjuryandIllness/medicalinfo\\_AS.asp](http://www.alaskasworld.com/es/EmployeeInjuryandIllness/medicalinfo_AS.asp)



Thanks for looking into these items, they will help me to assist you in the best way possible.

~ Lisa

# **EXHIBIT B**

Printed by: Roxanne Helling  
Title: Re(2): sick leave : Eagle Server

Monday, February 10, 2014 9:47:17 AM  
Page 1 of 2

From:  Roxanne Helling  
Subject: Re(2): sick leave  
To:  Leslee Cabulagan

Friday, January 24, 2014 1:58:00 PM 

Here is a copy of the email body. sorry. I forgot to add it before I ran out to train. Rox

Rox ~ When we met Tues I was caught off guard with your request for extended time off in Feb. After our meeting I reviewed the team calendar and projects. Normally, it wouldn't be a problem. But as you know, we are short staff and we are in the midst of huge body of work with the Delta transition. The timing is bad, there is simply too much to do and having you out at this time puts extra work on others.

So I have to ask for the following: would it be possible for you to reschedule sometime after March?

If you can't reschedule, due to your condition I will need you to provide a doctor's note and request FMLA as soon as possible.

[http://www.alaskasworld.com/es/EmployeeInjuryandIllness/medicalinfo\\_AS.asp](http://www.alaskasworld.com/es/EmployeeInjuryandIllness/medicalinfo_AS.asp)

Thanks for looking into these items, they will help me to assist you in the best way possible. ~  
Lisa

Thanks  
Roxanne Helling  
Training Delivery Specialist  
x27890 206 392-7890  
Cell phone # 206 718-4759

**Leslee Cabulagan on Friday, January 24, 2014 at 10:38 AM -0800 wrote:**

Hi Roxanne,

That's good to hear. I did not see an attachment, can you resend that to me.

Leslee

**Roxanne Helling on Friday, January 24, 2014 at 8:23 AM -0800 wrote:**

Hi Leslee- Thanks for taking the time to listen and help me yesterday.

I did contact Matrix and they have advised me that I qualify for FMLA and that I can start the process.

Should I contact the intake person today to get this started.

I have attached a copy of the note from Lisa so that you can understand her request. Again I do not want to come across as complaining about her I just want to make sure that I can protect my position at a very difficult time.

Next UnreaRoxanne Helling

Monday, February 10, 2014 9:47:17 AM

Title: Re(2): sick leave : Eagle Server

Page 2 of 2

---

Thanks

Roxanne Helling

Training Delivery Specialist

x27890 206 392-7890

Cell phone # 206 718 4759

# EXHIBIT C

**Performance Document - Perf Partnership - Annual****Manager Evaluation**

Roxanne Helling, Training Delivery Specialist

Perf Partnership - Annual: 01/01/2013 - 12/31/2013

Author: Lisa McCarroll Role: Manager  
 Status: Completed Due Date: 02/28/2014  
 Approval: Not Required Discussion Date: 02/04/2014

The document status is Completed.

[Return to Document Detail](#)[Expand All](#)[Collapse All](#)[Expand Sections](#)**Section 1 - Goal Progress**[Expand](#)[Collapse](#)**Goal Progress**

**Comments:**

1. To continue to work with the trainers at the station level by giving them training suggestions, and coaching skills.
2. To contact and research Telling Ain't Training ( Harold and Erica) regarding getting this program available to our team and or the trainers Conference in October.
3. To attend a continuing education class on WebEx presentation and to become more comfortable in presenting.

Created By: Template 12/16/2013 10:29AM  
 Last Modified By: Lisa McCarroll 01/30/2014 2:55PM

**Section 2 - Business Comprehension**[Expand](#)[Collapse](#)**Business Comprehension****Description :****Marketing and Network Planning**

- \* Understands marketing programs and is able to clearly communicate the benefits to others
- \* Identifies and leverages revenue generating opportunities
- \* Understands forecasting and route planning processes

**Operations**

- \* Understands aircraft turn timeline and importance of driving consistent operational results
- \* Identifies with customer experience from curb to seat and seat to curb and its impact on customer relationships
- \* Recognizes key operational performance indicators and individual influence on key metrics
- \* Familiar with factors that influence operational performance and customer experience (e.g. - weather, overbooking, bag handling, etc.) understands processes for mitigating circumstances

**Industry Economics and Financial Management**

- \* Familiar with airline economics and financial terminology
- \* Understands the key levers that drive increased productivity and/or reduced costs
- \* Demonstrates thorough knowledge of division processes/projects; able to assess and make recommendations to reduce costs and increase productivity

Rating: X - Fully Successful



Created By: Template 12/16/2013 10:29AM  
 Last Modified By: Lisa McCarroll 01/30/2014 1:24PM

**Section 3 - Technical Skills**[Expand](#)[Collapse](#)**Technical Skills****Description :**

Job Knowledge &amp; Technical/Technological Application

- \* Possesses a strong level of job knowledge paralleled with technical and technological knowledge in job-related areas
- \* Applies skills and knowledge to analyze issues and make informed decisions
- \* Stays abreast of current developments and trends in areas of expertise

Rating: W - Needs Development



Created By: Template 12/16/2013 10:29AM  
Last Modified By: Lisa McCarroll 01/30/2014 1:24PM

#### Section 4 - Core Competencies

[Expand](#)

[Collapse](#)

##### Maintain Humility

###### Description :

Maintain Humility and Fierce Resolve

- \* Tell the truth and keep commitments in the face of challenges and setbacks
- \* Maintain effectiveness when experiencing major changes in work tasks or the work environment
- \* Admit mistakes, ask for help and move forward without defensiveness
- \* Support new ideas of others
- \* Frequently give credit to others

Rating: W - Needs Development



Created By: Template 12/16/2013 10:29AM  
Last Modified By: Lisa McCarroll 01/30/2014 1:24PM

##### Interpersonal Interaction

###### Description :

Interact with People Courageously, Directly and Candidly

- \* Communicate confidently and respectfully at team, divisional and corporate levels
- \* Challenge status quo thinking and practices with breakthrough proposals
- \* Proactively manage difficult situations toward resolution
- \* Give and receive feedback honestly and quickly to achieve accountability and high performance

Rating: W - Needs Development



Created By: Template 12/16/2013 10:29AM  
Last Modified By: Lisa McCarroll 01/30/2014 1:24PM

##### Cross Divisional Inclusion

###### Description :

Think and Work Beyond Divisional Boundaries

- \* Achieves high performance by creating a diverse and inclusive team environment
- \* Place company success above divisional and personal success
- \* Approach work, decisions and use of resources with a company-wide perspective

Rating: X - Fully Successful



Created By: Template 12/16/2013 10:29AM  
Last Modified By: Lisa McCarroll 01/30/2014 1:24PM

##### Customer Service

###### Description :

Focus on the Customer

- \* Make internal and external customers and their needs a primary focus of one's actions
- \* Develop and sustain productive customer relationships while meeting demands of the business

Rating: X - Fully Successful



Created By: Template 12/16/2013 10:29AM  
Last Modified By: Lisa McCarroll 01/30/2014 1:24PM

##### Accountability

###### Description :

Holds Self and Others Accountable

- \* Set high standards of performance for self and others
- \* Assume responsibility and accountability for successfully completing assignments or tasks
- \* Self-impose standards of excellence rather than have standards imposed by others
- \* Demonstrate a "can do" approach to work

Rating: W - Needs Development





Created By: Template 12/16/2013 10:29AM  
 Last Modified By: Lisa McCarroll 01/30/2014 1:24PM

#### [-] Safety & Security

##### Description :

##### Conscious of Safety and Security

- \* Demonstrate a professional, proactive concern for the welfare of others
- \* Be aware of conditions that affect employee and customer safety and act in accordance
- \* Remain current on new and changing regulations and procedures and encourage others to do the same

Rating: X - Fully Successful

100%

Created By: Template 12/16/2013 10:29AM  
 Last Modified By: Lisa McCarroll 01/30/2014 1:24PM

#### [-] Section 5 - Overall Summary

##### Overall Summary Summary

Rating: W - Needs Development

75%

Comments: Rox comments: I feel like I have grown this year as I have stepped out of my comfort zone to expand my skills for the trainers, my team and myself.

##### Lisa comments:

From our meeting 6/11/13 I shared with you where I believed your performance ratings were at the midpoint in the year. I specifically mentioned that I saw your strengths as a potential leader because of your willingness to learn and that you don't accept the status quo. What we chatted most about was that you need to improve your execution of daily tasks and project work. Having the ideas is only half the battle; you need to see things through to completion. I informed you of a needs development in the competency of Accountability and I also shared that I was on the fence with two other competencies Maintain Humility and Interpersonal Interactions.

In looking at your items on the "work-in-progress" document you have lacked progress. In addition, your progress in Maintain Humility and Interpersonal Interaction has slipped into needs development. I have specific examples I wish to discuss with you.

In looking at the year in review you are overall is in the needs development category. What I need from you is to correct this immediately.

#### [-] Section 6 - Career Development

[Expand](#)

[Collapse](#)

##### Career Development Summary

Comments: Rox Comments: I will continue to move forward on working with the field trainers. My goal would be to create some smaller learning venues for our trainer. I would like to see trainers questions be a one stop shop or phone call away. I have some ideas generated from our team meeting that I will move forward with in 2014. What I need is guidance as to how I do this, making myself look like a strong leader without appearing to be to strong.

##### Lisa comments:

Rox you need to read the instructions above for this section and answer the questions specifically.

#### [-] Section 7 - Planning

[Expand](#)

[Collapse](#)

##### [-] Performance & Development Goals for the Next Review Period

Comments: Lisa comments:  
 Rox you need to complete the planning section of the document.

Created By: Template 12/16/2013 10:29AM  
 Last Modified By: Lisa McCarroll 01/30/2014 1:34PM

#### [-] Section 8 - Employee Comments

The employee may use this section for comments and feedback in the self-evaluation process. Only the employee may add or edit the comments in this section. Some areas the employee might address could include responses to the following questions:

- What can my manager do to support me in my current position?*
- What areas would I like to see adjusted in how I am managed?*
- What feedback can I offer my manager?*
- What feedback will have the greatest impact on improving his or her effectiveness?*
- What positive feedback would I like to offer to my manager?*

Comments: I feel I have grown more in the last year then I have in a number of years here at Alaska. I feel my manager has given me growth challenges. I still need direction as I am not confident in how I met the needs and expectation of upper management. I need to have my timelines more clear so that I met the goals and expectations of all. Sometime I feel that my project may be sidelined because of more current needs and then I disappoint others.

#### Section 9 - Discussion Summary

Comments:

#### Audit History

Created By:	Lisa McCarroll	12/26/2013 2:34:07PM
Last Modified By:	Lisa McCarroll	02/03/2014 11:39:30AM
Completed By:	Lisa McCarroll	02/03/2014 11:39:30AM



[Return to Document Detail](#)

# EXHIBIT D

## Performance Document - Perf Partnership - Annual **Manager Evaluation**

Roxanne Helling, Training Delivery Specialist  
Perf Partnership - Annual, 01/01/2012 - 12/31/2012

**Author:** Lisa McCarroll

**Role:** Manager

**Status:** In Progress

**Due Date:** 02/28/2013

**Approval:** Not Required

Welcome to the online e-performance tool. For full instructions on completing this document, including competency definitions, please review available reference documents on the Talent Development website.

Important guidelines to remember:

Complete all sections of the document

You can pause and save a document to finish later by clicking the Save button

You can print a copy of the review by selecting the View Printable Evaluation link

Your session will expire in 20 minutes. To avoid losing data, please save your work often.

### Section 1 - Goal Progress

The employee's current goals are auto-populated from his/her previous performance document into the comment box below. Use this section to document an evaluation of the employee's progress on these goals as well as any other commitments, assignments, priorities or performance items for this review period.

#### **Goal Progress**

Goals to be completed by the end of the year 2012:

1. Complete two training audits on Fleet vendor training programs, document findings, report the results to management and make recommendation for each area of concern.

Complete

2. Attend professional continuing education class that will support the training delivery mission by the end of the year 2012.

Complete

3. I will mentor the trainers assigned to me and a plan if need will be documented, and shared with my manager.

**Comments:**

Complete

4. Promote the Station Trainer Award program, encourage participation and increase the number of nomination by 25%, to be attained by the end of the 3rd quarter 2012.

Complete

5. Increase the number of one-one meetings with direct manager to at least 15 meetings to be completed by the end of the year 2012.

Complete

6. Complete mentoring project, to include all assigned trainers in Customer Service Airports. All trainers will be contacted by the end of the first quarter, each individual plan will be in place

by the end of the second quarter and status of the plan will be determined and reported by the end of the year 2012.

Complete

Created By :	Template	01/16/2013 6:18PM
Last Modified By :	Lisa McCarroll	02/26/2013 8:16PM

## Section 2 - Business Comprehension

Identified below are the core business categories integral to running a successful airline. Review them with your employee and evaluate his/her knowledge of and impact in each area for this review period. Marketing & Network Planning, Operations, and Industry Economics & Financial Management

### **Business Comprehension**

**Rating:** X - Fully Successful

Created By :	Template	01/16/2013 6:18PM
Last Modified By :	Lisa McCarroll	02/26/2013 7:21PM

## Section 3 - Technical Skills

Rate your employee on the Job Knowledge & Technical/Technological Application competency for this review period.

### **Technical Skills**

**Rating:** X - Fully Successful

Created By :	Template	01/16/2013 6:18PM
Last Modified By :	Lisa McCarroll	02/26/2013 7:21PM

## Section 4 - Core Competencies

Please rate your employee on each competency listed below for this review period. Full competency descriptions are available on the Talent Development website.

### **Maintain Humility**

**Description** Maintain Humility and Fierce Resolve

**Rating:** X - Fully Successful

Created By :	Template	01/16/2013 6:18PM
Last Modified By :	Lisa McCarroll	02/26/2013 7:21PM

### **Interpersonal Interaction**

**Description** Interact with People Courageously, Directly and Candidly

**Rating:** X - Fully Successful

Created By :	Template	01/16/2013 6:18PM
Last Modified By :	Lisa McCarroll	02/26/2013 7:21PM

**Cross Divisional Inclusion****Description** Think and Work Beyond Divisional Boundaries**Rating:** X - Fully Successful

Created By : Template 01/16/2013 6:18PM

Last Modified By : Lisa McCarroll 02/26/2013 7:21PM

**Customer Service****Description** Focus on the Customer**Rating:** X - Fully Successful

Created By : Template 01/16/2013 6:18PM

Last Modified By : Lisa McCarroll 02/26/2013 7:21PM

**Accountability****Description** Hold Self and Others Accountable**Rating:** X - Fully Successful

Created By : Template 01/16/2013 6:18PM

Last Modified By : Lisa McCarroll 02/26/2013 7:21PM

**Safety & Security****Description** Conscious of Safety and Security**Rating:** X - Fully Successful

Created By : Template 01/16/2013 6:18PM

Last Modified By : Lisa McCarroll 02/26/2013 7:21PM

**Section 5 - Overall Summary**

Reflect upon your employee's overall performance for this review period and use the comment box below to note which sections and competencies are areas of strength and which are possible areas for development. Select a rating that supports your comments and most closely matches his/her overall performance.

**RATING SCALE**

Not Applicable

Needs Development

Fully Successful



Superior

Recently hired, transitioned, or promoted into a new role with little or no work performance to review. May also include employees out on a leave of absence during current review period. May apply when new managers have had little or no interaction with his/her new team and the leader is without a resource of performance-related feedback.

Occasionally meets expectations, but needs competency and/or job skill development. Actions may impact department metrics negatively. Close guidance may be needed. Shows responsiveness to coaching. Not ready to assume additional responsibilities.

Successfully meets the expected level of performance in most competencies and department metrics. In some areas performance may exceed expectations. The employee thoroughly understands the position and seeks out feedback to increase technical or relational skills. Demonstrates potential to assume additional responsibilities.

Actively seeks out and successfully takes on new challenges and responsibilities. Consistently exceeds the expected level of performance in all competencies and department metrics. Has mastered his/her job responsibilities, acts as role model for others both in technical and behavioral attributes and is ready to take on a new role within the organization

#### Overall Summary Summary

**Rating:** X - Fully Successful

**Comments:** Rox Comments:

I feel like I have given a large amount of my self this last year in trying to obtain the goals set by the company, my manager and myself. I have enjoyed the challenges placed before me both in meeting the company goals as well as my own personal goals.

Lisa Comments:

Rox continues to grow in her role as a Training Specialist. What impresses me most is that she is open to receiving feedback and applies accordingly. I believe this ability to learn and grow will lead to a higher level of success for Rox.

#### Section 6 - Career Development

As a manager, it is important to understand your employee's short and long-term career goals and your role in helping him/her achieve success. Your employee has been asked the following questions in his/her self-evaluation:

What are your career goals?

How will you achieve them?

What can your manager do to help you?

Use the Writing Tools link to review his/her responses and add his/her comments to the box below. During the conversation, ensure you have a solid understanding of your employee's career plan and level of satisfaction with his/her current role and the organization. Some additional questions could include:

What do you like most about your job?

What keeps you here?

#### Career Development Summary

**Comments:** My career goal for the last 6 years was to be out in the field training. I have enjoyed that but would now like to do more personal one on one coaching and or mentoring to our trainers as well as staff within our management group that are preparing for presentations or classes. I would like to hear my managers suggestion on how I can get there as far as what I need to do.

### Section 7 - Planning

In the comment box below, indicate any new or changing priorities for the next review period. Be sure to include an action plan for additional training, development for career advancement, or self-improvement goals. Ensure documented commitments are SMART: Specific, Measurable, Attainable, Relevant, and Timely.

#### **Performance & Development Goals for the Next Review Period**

**Comments:**

1. To continue to work with the trainers at the station level by giving them training suggestions, and coaching skills.
2. To contact and research Telling Ain't Training ( Harold and Erica) regarding getting this program available to our team and or the trainers Conference in October.
3. To attend a continuing education class on WebEx presentation and to become more comfortable in presenting.

Created By :	Template	01/16/2013 6:18PM
Last Modified By :	Lisa McCarroll	02/26/2013 7:21PM

### Section 8 - Employee Comments

**Comments:** I need open communication. I worry about everything and need to know where I need improvement as well as well I am doing well.  
I would like to take on new challenges or even make a change but need to know if my manager feels comfortable or has confidence that I can do something different. If not what do I need to do to get to my goal.

### Section 9 - Discussion Summary

**Comments:** I thoroughly enjoyed learning more about Rox through this PP meeting process. Rox is ready for a challenge. She is passionate about her experience with Telling Aint Training and committed to bringing to more people at Alaska. I will support her efforts.

In Jan. I provided the team with a document defining my "Expectations." We reviewed the document together in a team meeting and I also took this opportunity to revisit during our PP meeting to allow for clarification and I received confirmation that Rox is clear on my expectations of her work.

#### **Audit History**

<b>Created By :</b>	Lisa McCarroll	01/16/2013 6:18:08PM
<b>Last Updated By :</b>	Lisa McCarroll	02/26/2013 8:22:40PM



# **EXHIBIT E**

February 10, 2014

Michala, HR Alaska Airlines Airport Services

I understand from Pat Knollen that you are aware of my concerns on my medical leave and my concerns regarding the possible repercussions that might occur.

I am very concerned and uncomfortable at this time talking with anyone regarding this as I feel that I am being retaliated against because I have sought HR help. I have received verbal

lashings as well as down right abuse following this meeting with Leslie on January 23rd. My job performance on January 24 was not a concern became a needs development Performance Partnership on February 4th. I have had no written communication of concerns but have been told that this visit was uncalled for and damaging.

I have never in 16 1/2 years had anything like this happen to me. My performance and character has never been questioned.

I am really not sure where I go from here.

When I sought advice on my leave on January 23, 2014 it was truly for advise not to get anyone in trouble and certainly not to question the character of my manager. It seems that this has now become an issue and I am not being trustworthy.

I am going out on my approved FMLA medical leave tomorrow February 11th. What do I need to do so that I can come back to work without this hanging over my head.

Thank you

Roxanne Helling


# **EXHIBIT F**

Printed by: Roxanne Helling  
Title: Re: followup : Eagle Server


Tuesday, July 08, 2014 1:11:28 PM  
Page 1 of 1

---

From:  Roxanne Helling

Friday, June 20, 2014 1:47:18 PM 

Subject: Re: followup

To:  Jeff Butler

---

Jeff Thanks for the feedback I understand and I'm doing my best to be successful.  
Sent from FirstClass with my iPhone

**Jeff Butler writes:**

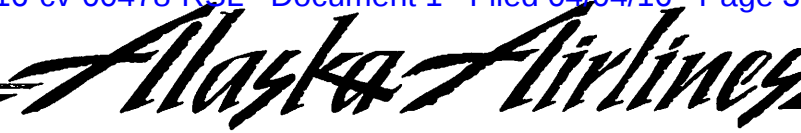
rox, i followed up with HR to make certain i was correct about the opportunity to apply elsewhere in the company provided the skill sets identified to work on in your PIP were different from the skill sets in the job you might want to apply for. turns out i'm wrong, in fact the policy apparently changed following a scenario where we allowed exactly what i was suggesting, but in the end that person's new job didn't work out either. my apologies for the mis information yesterday afternoon. the right and best answer is let's get this PIP successfully behind us!

also, i reached out to susie asking to chat.

enjoy your weekend. /jeff

Jeff Butler | Vice President, Airport Operations and Customer Service | Alaska Airlines | work: 206-392-7831 | cell: 206-849-7423 | [jeff.butler@alaskaair.com](mailto:jeff.butler@alaskaair.com)  
[Image:iamalaskasmall.jpg]  
"Win a customer every day"

# EXHIBIT G



July 15, 2014

Subject: Performance Improvement Plan

Roxanne,

The primary objective of a Performance Improvement Plan is to ensure that an employee is aware of performance expectations and areas where additional development is needed. When we met at the beginning of 2014 to discuss your annual review, there were areas where your performance was inconsistent with the company's expectation and a decision was made to place you on a ninety day performance improvement plan (PIP). The areas of focus have been:

- Job Knowledge & Technical/Technological Application
- Maintain Humility and Fierce Resolve
- Interact with People Courageously, Directly and Candidly
- Holds Self and Others Accountable

The bi-weekly performance conversations concluded on July 10, 2014 and after a thorough review of your performance over the past 90 days it has been determined that you have not been successful in the Performance Improvement Plan.

On July 10, 2014, you indicated that you have made a decision to retire from Alaska Airlines effective September 1, 2014 in-lieu of involuntary separation. We have accepted your retirement resignation and agree to allow you to utilize 120 hours of paid time off (PTO) intermittently over the next 7 weeks.

My expectation is that for the remainder der of your employment with the company you will sustain the positive changes you have made during the PIP.

Please let me know if you have any questions or need additional support during this transitional period.

Sincerely,

A handwritten signature in black ink, appearing to read "Stacie Baker", is written over a large, stylized, and somewhat abstract signature graphic that spans across the signature line.

Stacie Baker  
Director, Airport Training and Leadership

# EXHIBIT H

**Roxanne Helling**

22226 Cliff Ave S #303 • Des Moines, WA 98198  
Phone: 206 718-4759 • Email: Roxanne.Helling@comcast.net

September 1st, 2014

Stacie Baker

Director of Training for Airport Operations and Customer Service

Alaska Airlines

20833 International Blvd

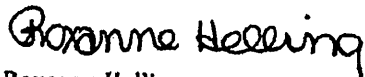
Seattle, WA 98198

Stacie:

My separation checklist requested a written resignation. I find that a bit odd based on the fact that I didn't resign from Alaska Airlines but was forced into retirement following my performance plan results. I understand that I did not have a choice to stay based on my PIP and chose to take my retirement so that I could depart on good standing allowing my retirement package to be better. We have spoke about this and I did include you and Lori in the email advising you of my decision. I also did receive your letter advising me of my PIP results and that you accepted my retirement date as of September 1st, 2014.

I hope this will clear up any confusion regarding resignation versus retirement. I have taken great pride in my 17 years of service and do not want this to be viewed as a resignation at a time when our work group is extremely busy.

Thank You



Roxanne Helling